## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE BECHEN, RONALD BIENDSEIL, RON BOONE, VERA BOONE, ELVIRA BUMPUS, EVANJELINA CLEEREMAN, SHEILA COCHRAN, LESLIE W. DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH, CLARENCE JOHNSON, RICHARD KRESBACH, RICHARD LANGE, GLADYS MANZANET, ROCHELLE MOORE, AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS, JEANNE SANCHEZBELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Civil Action File No. 11-CV-562

Plaintiffs,

Three-judge panel 28 U.S.C. § 2284

TAMMY BALDWIN, GWENDOLYNNE MOORE and RONALD KIND.

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI, PAUL D. RYAN, JR., REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

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DECLARATION OF JILL BRADSHAW IN SUPPORT OF PLAINTIFFS' RESPONSE TO CIVIL L.R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION OF NON-PARTIES WISCONSIN SENATE AND ASSEMBLY FOR CLARIFICATION OF THE COURT'S DISCOVERY ORDER

## VOCES DE LA FRONTERA, INC., RAMIRO VARA, OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

## Plaintiffs,

v.

Case No. 11-CV-1011 JPS-DPW-RMD

Members of the Wisconsin Government Accountability Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, and TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

## Defendants.

- I, Jill Bradshaw, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:
- 1. I am a law librarian with the law firm of Godfrey & Kahn, S.C., the attorneys for plaintiffs in the above-captioned action. I make this declaration based on my personal knowledge and in support of plaintiffs' response to the Civil L.R. 7(h) Expedited Non-Dispositive Motion of Non-Parties Wisconsin State Senate and Wisconsin State Assembly for Clarification of the Court's Order of 12/8/11.
- 2. Attached as Exhibit 1 to this declaration is a copy of lobbyist records for Joe Handrick that I printed from the website of the Wisconsin Government Accountability Board on December 15, 2011.
- 3. Attached as Exhibit 2 to this declaration is a copy of a ballot from Senate Majority Leader Scott L. Fitzgerald to members of the Committee on Senate Organization on a motion "to authorize the hiring of the law firms of Michael Best & Friedrich, LLP and Troupis

Law Office, LLC for services related to redistricting of legislative and congressional districts for the 2012 elections." I obtained this document from WisPolitics.com on December 2, 2011.

- 4. Attached as Exhibit 3 to this declaration is a copy of a motion authorizing "the Speaker of the Assembly, Jeff Fitzgerald, to retain legal counsel for the purpose of apportioning and redistricting the Legislative and Congressional Districts following the 2010 decennial Census." I obtained this document from WisPolitics.com on December 2, 2011.
- 5. Attached as Exhibit 4 to this declaration is a copy of a letter, dated January 5, 2011, from Senate Democratic Leader Mark Miller and Assembly Democratic Leader Peter Barca to Majority Leader Fitzgerald and Speaker Fitzgerald regarding the retention of outside legal counsel for purposes of legislative redistricting. I obtained this document from WisPolitics.com on December 2, 2011.
- 6. Attached as Exhibit 5 to this declaration are copies of press releases issued by Senate Majority Leader Scott Fitzgerald and Assembly Speaker Jeff Fitzgerald, both dated January 5, 2011, regarding the redistricting process. I obtained these documents from WisPolitics.com on December 2, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 15, 2011.

Jill Bradshaw Law Librarian

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